

REMARKS

This amendment is in response to a first Office action (Paper No. 3) dated October 25, 2002. Upon entry of this amendment, claims 1-41 will be pending in this application. Applicant has newly added claims 26-41 by this amendment.

In Paper No. 3, the Examiner objected to the title of the invention. Applicant has amended the title of the invention to overcome this objection.

In Paper No. 3, the Examiner has rejected claims 1, 5, 7, 8, 10, 11, 13, 15, 16, 21 and 23 under 35 U.S.C. § 103 (a) as being unpatentable over Kunishi *et al.*, U.S. Patent No. 5,991,557 in view of Jeong *et al.*, U.S. Patent No. 6,246,847. The Examiner has also rejected claims 3 and 18 under 35 U.S.C. § 103 (a) as being unpatentable over Kunishi '557 in view of Jeong '847 and further in view of Kajiwara *et al.*, U. S. Patent No. 6,339,476. Applicant has the following comments.

In Paper No. 3, the Examiner uses Kunishi '557 for the teaching of applying a different frequency of AC voltage to the charge roller depending on whether the print job is character or photographic. The Examiner relies on Jeong '847 to fill in for the deficiencies of Kunishi '557. In particular, the Examiner relies on Jeong '847 for the teaching a power supply.

However, Applicant submits that Jeong '847 pertains to varying the voltage to a *transfer*

roller *after* a printing to remove waste toner from the transfer roller. Applicant's claimed invention pertains to varying the voltage magnitude applied to the *charge* roller just *prior* to a printing. Applicant's claimed invention claims that the magnitude of the voltage applied to the charge roller is dictated by the type of print job submitted by a user. In Jeong '847, the magnitude of the voltage applied to the transfer roller is determined by the stage in the printing process and occurs after every print job.

In Paper No. 3, the Examiner turns to Jeong '847 to fill in for the deficiencies of Kunishi '557 to reject Applicant's claims. Applicant submits that one having ordinary skill in the art would not turn to Jeong '847 to fill in for the deficiencies of Kunishi '557. Jeong '847 pertains to power management applied to the electrophotographic device to clean the electrophotographic device of unwanted waste toner while Kunishi '557 pertains to power management to achieve better print quality. Because these two patents are so unrelated, Applicant submits that one having ordinary skill in the art would not turn to Jeong '847 to fill in for the deficiencies of Kunishi '557.

Since Jeong '847 varies voltage only to the transfer roller while Applicant's claimed invention pertains to varying voltage to the charge roller, Applicant further submits that if Kunishi '557 were modified according to Jeong '847, Applicant's claimed invention would not result. This is because if Kunishi '557 were modified according to Jeong '847, the transfer roller and not the charge roller would vary in voltage. Furthermore, if Kunishi '557 were modified

according to Jeong '847, the voltage applied to the transfer roller would vary with every print job, instead of varying only when a different type of print job (*i.e.*, change in resolution or graphics versus text printing) is submitted. Therefore, Applicant submits that even if Kunishi '557 were combinable with Jeong '847, Applicant's claimed invention would not result.

Applicant further submits that even if Jeong '847 were combinable with Kunishi '557, these two patents, taken either singly or in combination would not teach or fairly suggest the notion of varying the magnitude of voltage applied to the charge roller based on the type of print job submitted by the user. This is because neither Jeong '847 nor Kunishi '557 teach or suggest these features. Therefore, the prior art rejections must be withdrawn.

Applicant also submits that all of Applicant's rejected claims were rejected using the Jeong '847 reference. Applicant submits that this reference is disqualified under 35 U.S.C. § 103 (c) for the reason that Jeong '847 and the instant application have a common assignee at the time the present invention was made, both were owned by SamSung Electronics Co., L.t.d.. Therefore, under 35 U.S.C. § 103 (c) and MPEP 706.02 (I), the prior art rejections are now moot.

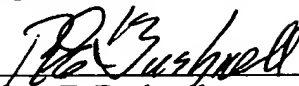
Applicant is newly adding claims 26-41 by this amendment. These claims contain features not found in the applied prior art. These features include that the magnitude of the voltage applied to the charge roller is varied, that the power of the laser scanning unit is varied based on the voltage applied to the charge roller, that these voltages are applied to the charge

roller immediately prior to printing, that the resolution and graphic/text mode are selected by a user through a software interface when the user submits the print job. Applicant submits that no new matter is being introduced by this amendment. Entry of, and favorable examination of these claims is respectfully requested.

A fee of \$456.00 is incurred by the addition of two (2) more independent claims in excess of 4 and sixteen (16) claims in excess of 25. Applicant's check drawn to the order of Commissioner accompanies this Response. Should the check become lost, be deficient in payment, or should other fees be incurred, the Commissioner is authorized to charge Deposit Account No. 02-4943 of Applicant's undersigned attorney in the amount of such fees.

In view of the above, all claims are deemed to be allowable and this application is believed to be in condition to be passed to issue. Reconsideration of the rejections and objections is requested. Should any questions remain unresolved, the Examiner is requested to telephone Applicant's attorney.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "R. E. Bushnell", is written over a horizontal line.

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MARKED-UP VERSION OF AMENDMENTS

IN THE TITLE

Please amend the title to read as follows:

[ELECTROPHOTOGRAPHIC PRINTING METHOD AND APPARATUS] METHOD
AND APPARATUS FOR AN ELECTROPHOTOGRAPHIC PRINTER WHERE VOLTAGE
MAGNITUDE APPLIED TO CHARGE ROLLER AND INTENSITY OF ILLUMINATION
UNIT VARY DEPENDING ON TYPE OF PRINT JOB SUBMITTED.

IN THE CLAIMS

Please newly add claims 26-41 by this amendment as listed above: